



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/DMP:ICR/NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 12, 2017

By FedEx and ECF

Robert J. Cleary, Esq.
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Proskauer Rose LLP
11 Times Square
New York, NY 10036

Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, some of which has been designated “Sensitive Discovery Material” under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the “February 22 Order”). This disclosure supplements the government’s earlier disclosures under cover of letters dated February 15, 2017, May 22, 2017, and May 24, 2017. This disclosure is made pursuant to the proposed stipulation regarding draft English-language translations circulated to counsel earlier today, and the government reserves the right to claw back any draft transcripts produced in this disclosure if the parties do not enter the proposed stipulation. The government renews its request for reciprocal discovery from the defendant.

Enclosed are the following:

- Records of Bank of America, N.A. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ030574-DZ041973);
- Records of Scottrade, Inc. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ041974-DZ042571);

- Records of HSBC Bank USA, N.A. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ042572-DZ043249);
- Records of JPMorgan Chase, N.A. and Chase Bank USA, N.A. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ043250-DZ046493);
- Records of the Bank of China, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ046494-DZ053178);
- Records of Webster Bank, N.A., which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ053190-DZ055471);
- Records of KEB Hana Bank, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ055472-DZ055787);
- Records of Equifax Inc., which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ055796-DZ055834);
- Records of Experian PLC, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ055835-DZ055848);
- Records of TransUnion, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ055849-DZ055855);
- Documents obtained from searches of premises located at Pavonia Avenue in Jersey City, New Jersey, and Summit Avenue in Jersey City, New Jersey (collectively the “Jersey City Premises”), which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ055856-DZ060696);¹

¹ A briefcase and original documents are in the government’s possession. If you would like to view these hard-copy materials, please contact us to arrange a mutually convenient time.

- Photographs taken and documents created during the searches of the Jersey City Premises (DZ060697-DZ061026);
- Records of Related Management Company, L.P., which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ061027-DZ061087);
- Communications obtained as a result of a search of electronic devices and email accounts belonging to third parties, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ061088-DZ061635);
- Records of China Tour & Travel, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ061636-DZ061638);
- Records of Safety Dynamics, LLC (DZ061639-DZ061772);
- Records of ScapeWare 3d LLC, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ061773-DZ061849);
- Video recordings made in or around the vicinity of a private residence located in Fresh Meadows, New York, on or about October 7 and October 8, 2015, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ_Video000001-DZ_Video000081)²;
- Correspondence from counsel for entities affiliated with Liaoning Rilin Construction, (Group) Co., Ltd. (the “Rilin Entities”) regarding document productions (RILIN000067-RILIN000068);
- Documents provided by the Rilin Entities (WLE 0063924-WLE 0065830 and USRE 0066364-USRE 0066519); and
- Privilege logs produced by counsel for entities affiliated with the Rilin Entities (RILIN000069-RILIN000212).

² The government is in possession of additional video recordings made in the same vicinity during the time period from approximately April 17, 2015, through approximately April 12, 2017. If you would like to view these video recordings, please contact us to arrange a mutually convenient time.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

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Enclosures (DZ030574-DZ061849)
(DZ_Video000001-DZ_Video000081)
(RILIN000067-RILIN000212)
(USRE0066364-USRE0066519)
(WLE0063924-WLE0065830)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)